

1 Q. Okay. What does that mean, what kind of help was  
 2 he offering?

3 A. Working in as a managerial role.

4 Q. And who was he managing?

5 MR. MERSINO: And I'll object and direct you not to  
 6 answer to the extent the answer -- do not identify any  
 7 undercover journalists by name.

8 BY MR. COUSENS:

9 Q. I'll -- I'll take an answer by type rather than by  
 10 name of person.

11 A. Uh-huh.

12 Q. What class of person was he managing?

13 A. I would say our journalists.

14 Q. Okay. What about Mr. Seddon, what was he supposed  
 15 to do?

16 A. I think it was similar -- a similar role.

17 Q. And Mr. Chamberlain?

18 A. Similar role.

19 Q. So it would be fair to say that they were there to  
 20 supervise or manage field staff?

21 MR. MERSINO: I will object to the form of the  
 22 question.

23 If you agree with the characterization or can  
 24 answer the question, you may.

25 THE WITNESS: I think it is fair to say.

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1 BY MR. COUSENS:

2 Q. Okay. Did you know Mr. Thomas before he was  
 3 engaged with Project Veritas?

4 A. I don't believe so.

5 Q. Did you know Mr. Seddon before he was engaged with  
 6 Project Veritas?

7 A. I don't believe so.

8 Q. Did you know Mr. Chamberlain before he was engaged  
 9 with Project Veritas?

10 A. I don't think so.

11 Q. Do you know how it was that any of the three came  
 12 to Project Veritas? How was the connection made?

13 MR. MERSINO: Object to the form of the question.

14 But you may answer if you are able.

15 THE WITNESS: I don't -- I don't recall exactly how  
 16 they -- how they arrived to us, I don't.

17 BY MR. COUSENS:

18 Q. Who would have been responsible for determining the  
 19 -- the contractual relationship between each of these three  
 20 persons and Project Veritas?

21 MR. MERSINO: I'll object to the extent the  
 22 question presupposes facts not into evidence.

23 If you are able to answer the question, you may.

24 THE WITNESS: Probably Russ, Russ Verney.

25 BY MR. COUSENS:

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1 Q. Do you know whether they were employees or engaged  
 2 in some other capacity?

3 MR. MERSINO: And you are referring to with Project  
 4 Veritas?

5 BY MR. COUSENS:

6 Q. Thomas, Seddon, Chamberlain, with respect to  
 7 Project Veritas?

8 A. I don't.

9 Q. Do you know if -- if they were not employees of  
 10 Project Veritas, do you know who their employer actually wa

11 MR. MERSINO: I am going to object to the extent it  
 12 calls for a hypothetical; as the witness says, he doesn't  
 13 know what their status was.

14 MR. COUSENS: Well, the question was does he know  
 15 who their employer actually was. He may not.

16 MR. MERSINO: It wasn't the full question.

17 But if you understand what he is asking, you can  
 18 answer.

19 THE WITNESS: I would have to check with Russ  
 20 Verney.

21 BY MR. COUSENS:

22 Q. Are there any personnel engaged at Project Veritas  
 23 presently who are not employees at Project Veritas, that is,  
 24 are considered contractors?

25 A. I believe so.

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1 Q. Do you know what the terms of any contract might  
 2 have been between Mr. Thomas, Mr. Seddon and Mr. Chamberlain  
 3 and Project Veritas?

4 A. I don't recall.

5 MR. MERSINO: And I'll just object that, again, it  
 6 presupposes facts not into evidence.

7 But you've answered, that's fine.

8 BY MR. COUSENS:

9 Q. Do you remember or know when each of these three  
 10 persons departed Project Veritas?

11 MR. MERSINO: Could you repeat your question, Mark.

12 MR. COUSENS: The question was does he know whether  
 13 -- I am sorry, when each of these three persons departed  
 14 Project Veritas.

15 MR. MERSINO: I'll object to the extent that it is  
 16 a compound question.

17 But if you are able to answer.

18 MR. COUSENS: Well, there are three individuals, so  
 19 he can break them down himself if he wants.

20 THE WITNESS: I don't remember the exact dates.

21 BY MR. COUSENS:

22 Q. Do you know why they departed Project Veritas?

23 A. I -- I think it was a short-term relationship and  
 24 they moved on to do other things.

25 Q. Have you been in touch with Mr. Thomas since he

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1 departed Project Veritas?

2 A. No.

3 Q. Have you been in touch with Mr. Seddon since he  
4 departed Project Veritas?

5 A. I don't believe so.

6 Q. Have you been in touch with Mr. Chamberlain since  
7 he departed Project Veritas?

8 A. No.

9 Q. Do you know where Mr. Thomas currently resides?

10 A. I don't know his address, no.

11 Q. Do you know where Mr. Seddon currently resides?

12 A. I don't believe I do.

13 Q. Do you know where Mr. Chamberlain currently  
14 resides?

15 A. No.

16 Q. Do you know whether these individuals signed  
17 non-disclosure agreements when they departed Project Veritas?

18 A. I would have to check with Russ Verney.

19 Q. You don't know yourself?

20 A. I would be making an assumption --

21 Q. All right.

22 A. -- so I would have to check with Russ Verney.

23 Q. Do you know if they were paid any consideration at  
24 the time of their departure?

25 A. I don't believe so.

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1 MR. MERSINO: And I am going to object to the  
2 extent it calls for a legal conclusion. Consideration for  
3 what?

4 BY MR. COUSENS:

5 Q. Any -- well, the first question is did they get  
6 anything at all?7 MR. MERSINO: Well, consideration I believe is a  
8 legal term, something for something else, so I am going to  
9 object to the form of the question.

10 BY MR. COUSENS:

11 Q. Did Project Veritas give any one of these three any  
12 money at the time of their departure other than that which  
13 was owed to date?14 MR. MERSINO: I am going to object to the form of  
15 the question.16 THE WITNESS: I don't understand the question,  
17 actually.

18 BY MR. COUSENS:

19 Q. Are you familiar with a domain name b6Cint.com?

20 MR. MERSINO: Mark, could -- for my purposes could  
21 you define what a domain name is.22 MR. COUSENS: A domain name is a title which is  
23 used by a server to recognize a unique class of internet  
24 addresses.

25 MR. MERSINO: If you understand the question, you

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I can answer.

2 THE WITNESS: I don't recall that domain name, no.

3 BY MR. COUSENS:

4 Q. Did Mr. Thomas threaten to litigate with Project  
5 Veritas with -- subsequent to his leave-taking?

6 A. I don't think so.

7 Q. Did Mr. Seddon threaten to litigate?

8 A. I don't think so.

9 Q. And did Mr. Chamberlain threaten to litigate?

10 A. I don't think so.

11 Q. Let's talk about Project Veritas' revenue sources.

12 Is the principal source of revenue for Project Veritas  
13 fundraising?

14 A. I would say yes.

15 Q. And what other sources of revenue other than  
16 contributions, either from individuals --

17 A. Uh-huh.

18 Q. -- or trusts or entities --

19 MR. MERSINO: I'll object to asked and answered to  
20 the extent that the witness has already stated at least two  
21 other sources that he believes.

22 THE WITNESS: Could you repeat the question again.

23 BY MR. COUSENS:

24 Q. Is the principal source of revenue for Project  
25 Veritas contributions -- voluntary contributions, either fr

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1 individuals, from corporations or organizations?

2 MR. MERSINO: And I'll object to the form of the  
3 question as to the definition of principal.4 If you are able to answer the question, which I  
5 believe you already have.

6 BY MR. COUSENS:

7 Q. Go ahead, Mr. O'Keefe.

8 A. Can you repeat the question one more time?

9 Q. Sure. Is the principal source of revenue, meaning  
10 the substantial portion of its budget, generated from  
11 contributions from individuals, corporations or other  
12 organizations?

13 MR. MERSINO: And I'll object to the form.

14 But you may answer.

15 THE WITNESS: Voluntary, is that the  
16 characterization?

17 BY MR. COUSENS:

18 Q. Yes.

19 A. Voluntary.

20 Q. I am not suggesting involuntary.

21 A. Okay. We don't accept union dues but we do have  
22 many people that support our mission, many, many people.23 Q. Okay. When you say people, you mean individual  
24 human beings?

25 A. Yes.

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1 And are there corporate enterprises which make  
 2 contributions to Project Veritas?

3 MR. MERSINO: I will advise the client this is a  
 4 yes-or-no question which you may answer but I will direct you  
 5 not to identify any individuals or organizations by name as  
 6 to the identity of any donors.

7 THE WITNESS: You say corporate, what?

8 BY MR. COUSENS:

9 Q. Are there corporations which make contributions to  
 10 Project Veritas?

11 MR. MERSINO: If you know?

12 THE WITNESS: I don't -- I don't -- I would have to  
 13 check with our -- with my staff about that, the  
 14 characterization of corporations.

15 BY MR. COUSENS:

16 Q. An incorporated business writes a check?

17 MR. MERSINO: Again, if you know.

18 BY MR. COUSENS:

19 Q. Back up a half step. As far as you know, it is  
 20 lawful for Project Veritas to accept contributions from  
 21 corporations?

22 MR. MERSINO: I am going to object to the extent  
 23 that it calls for a legal conclusion.

24 MR. COUSENS: The issue is what he knows.

25 THE WITNESS: Well, we have many individuals, some

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1 foundations. I don't know if a foundation is a corporation,  
 2 I suppose it is.

3 BY MR. COUSENS:

4 Q. You anticipated my next question. You receive  
 5 contributions from organizations that would include  
 6 foundations and trusts?

7 A. Yeah, we are a 501(c)(3) so we -- we receive  
 8 tax-deductible donations from many individuals and  
 9 foundations.

10 Q. Generating -- generating revenue through  
 11 fundraising is a lot of work, I assume?

12 MR. MERSINO: I am going to object to the relevance  
 13 of the question.

14 BY MR. COUSENS:

15 Q. You can answer.

16 A. It's one --

17 MR. MERSINO: I'll let you know when you can answer  
 18 or not.

19 THE WITNESS: Thank you.

20 MR. MERSINO: You can answer.

21 THE WITNESS: It is one of the things that is a lot  
 22 of work, yes.

23 BY MR. COUSENS:

24 Q. So Project Veritas has -- engages in direct appeal  
 25 to individuals for fundraising support?

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1 MR. MERSINO: I am going to object to the form of  
 2 the question.

3 You may answer if you understand what the question  
 4 is.

5 THE WITNESS: Direct appeal, what do you mean?

6 BY MR. COUSENS:

7 Q. You communicate directly with a human being and  
 8 say, please support us?

9 MR. MERSINO: And you mean -- when you say you, are  
 10 you referring to Mr. O'Keefe?

11 MR. COUSENS: I am referring to Project Veritas as  
 12 an entity.

13 THE WITNESS: It is one of the things that we do, I  
 14 would say.

15 BY MR. COUSENS:

16 Q. Does Project Veritas maintain a mailing list of its  
 17 donors?

18 A. Yes.

19 Q. Does Project Veritas rent mailing lists from  
 20 third-party vendors for the purpose of soliciting donors --  
 21 donations?

22 A. I believe we have.

23 Q. Does Project Veritas maintain an e-mail list which  
 24 is used to solicit donations?

25 A. Yes.

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1 Q. Does Project Veritas periodically rent e-mail lists  
 2 for the purpose of soliciting donations?

3 MR. MERSINO: I am going to object to the form of  
 4 the question.

5 If you know you may answer.

6 THE WITNESS: I believe that we have.

7 BY MR. COUSENS:

8 Q. Does Project Veritas send representatives to events  
 9 or meetings to discuss its activities?

10 MR. MERSINO: I am going to object to the relevance  
 11 of this question to the lawsuit we are here to discuss.

12 If you know the answer -- if you understand the  
 13 answer [sic], you may answer it.

14 THE WITNESS: Repeat the question.

15 BY MR. COUSENS:

16 Q. Does Project Veritas send representatives to events  
 17 or meetings to discuss its activities?

18 MR. MERSINO: Object to the vagueness of the  
 19 question.

20 THE WITNESS: I believe we do.

21 BY MR. COUSENS:

22 Q. In 2019 did you personally appear at any events or  
 23 meetings to discuss the activities of Project Veritas?

24 MR. MERSINO: Object to the relevance of the  
 25 question to the lawsuit in question here.

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